

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GAYBRIELL BRACEY, ET AL. : **No. 17-5640**
Plaintiffs :
v. :
CITY OF PHILADELPHIA, ET AL., :
Defendants :

**PLAINTIFFS' ACCEPTANCE OF
DEFENDANTS' OFFER OF JUDGMENT**

Plaintiffs, by their counsel, Paul Messing and Kairys, Rudovsky, Messing, Feinberg and Lin, pursuant to Fed.R.Civ.P. 68(a), hereby accept the attached Offer of Judgment of Defendants City of Philadelphia, Joseph Centeno, Ralph Domenic, Brian Peters, Mark Jones and James Griffin in the amount of Fifty Thousand Dollars (\$50,000.00).

Plaintiffs therefore request that the Clerk of Court enter judgment for the plaintiffs and against the defendants in the amount of Fifty Thousand Dolars (\$50,000.00).

Respectfully submitted,

S/ Paul Messing

Paul Messing
Kairys, Rudovsky, Messing, Feinberg & Lin
718 Arch Street, Suite 501S
Philadelphia, PA 19106
Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GAYBRIELL BRACY, et al.,	:	
Plaintiff,	:	
	:	
v.	:	Civil Action
	:	No. 17-5640
	:	
CITY OF PHILADELPHIA et al.	:	
	:	
Defendants.	:	

OFFER OF JUDGMENT

TO: Paul Messing
Kairys, Rudovsky, Messing, Feinberg & Lin
718 Arch Street, Suite 501S
Philadelphia, PA 19106
pmessing@krlawphila.com

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, **Defendants City of Philadelphia, Detective Ralph Domenic, Detective Joseph Centeno, Detective Brian Peters, Detective Mark Jones and Detective James Griffin**, by and through Aaron Shotland, Deputy City Solicitor, hereby offers to allow Judgment to be taken against him and in favor of **Gaybriell Bracy on her own behalf and on behalf of her minor children Ganiah Bracy and Edward Ferguson** for all claims for damages, costs, attorneys' fees and interest accrued to date, in the amount of **Fifty Thousand Dollars (\$50,000.00)**.

This Offer of Judgment is made solely for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed either as an admission that the defendants are liable in this action, or that the plaintiff has suffered any damages. Said judgment is to have no effect whatsoever except in settlement of this case. Additionally, this Offer of Judgment is not admissible as evidence in any proceeding, except, if rejected, in a proceeding to determine costs.

If this Offer of Judgment is not accepted in writing within fourteen (14) days, it shall be deemed withdrawn.

Date: 1/18/18



AARON SHOTLAND

Deputy City Solicitor
1515 Arch Street, 14th Floor
Philadelphia, PA 19102-5397

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Plaintiffs :
v. :
CITY OF PHILADELPHIA, ET AL.,
Defendants :

CERTIFICATE OF SERVICE

I, Paul Messing, certify that I have caused to be delivered by ECF and email a copy of Plaintiffs' Acceptance of Defendants' Offer of Judgment to:

Aaron Shotland, Esquire
Law Department
1515 Arch Street
Philadelphia, PA 19102
Counsel for Defendant

S/ Paul Messing
Paul Messing

Date: January 24, 2018